

CV-04 5638

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
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U.S. DISTRICT COURT E.D.N.Y.

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William and Barbara Bloom,

★ DEC 23 2004 ★

Plaintiffs,

(S.I.)

COMPLAINT
PLAINTIFFS DEMAND TRIAL BY JURY LONG ISLAND OFFICE

-against-

FOX NEWS of Los Angeles, its subsidiary
Channel Five Fox News of New York and employees
Rosanna Scotto and John Deutzman, reporter

SEYBERT, J.
LINDSAY, M.

Defendants
-----X

1. At all times hereinafter mentioned, plaintiffs were and still are residents of Bay Shore, N.Y.
2. Defendants are employees of a New York Corporation, an affiliate of a corporation licensed to do business in the State of California
3. The jurisdiction of this court is invoked pursuant to USC 1332 (diversity statute)
4. Without having made written or verbal contact with plaintiffs, Mr. Deutzman hammered on door of plaintiffs early in the morning, rudely awakening them and using a hidden camera and hidden microphone proceeded to embarrass and humiliate William calling this distinguished physician an incompetent, senile dirty old man. Ignoring plaintiff's pleading that he was plaintiff in a trial in Federal Court, Dietzman maliciously embarrassed and humiliated him in a six-minute program a week later stating he rubs his penis against and "spanks" his patients, a false statement he never bothered to check. When discussing this on the telephone, Dietzman warned that any further attempts to rectify his error could "backfire against the plaintiff". Scotto, commenting suggested that all "victims of this doctor" should get to be paid off by their insurance company, and that "the phones should be ringing off the hook."
- 5 Wherefore plaintiff demands twenty million dollars money damages and permanent injunction against the defendants from pursuing or invading the privacy of plaintiffs, and any further relief which the court may deem appropriate.

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